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Attorneys for Chapter 7 Trustee  
Kyle Everett

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re

BENJA INCORPORATED,

Debtor.

Case No. 20-30819-DM

Chapter 7

**DECLARATION OF JENNIFER C.  
HAYES IN SUPPORT OF  
REQUEST FOR ENTRY OF  
ORDER BY DEFAULT  
APPROVING TRUSTEE'S  
MOTION TO COMPROMISE OF  
CONTROVERSY (BUSEY BANK)**

I, Jennifer C. Hayes, declare as follows:

1. I am a partner at Finestone Hayes LLP, attorneys of record for Kyle Everett in his capacity as the duly appointed Chapter 7 Trustee of the bankruptcy estate of Benja Incorporated in the above-captioned case

2. All statements in this declaration are based on my own personal knowledge and observation, or upon information and belief based upon my review of the court and business records in this case. If called to testify on this matter, I could and would competently testify to the matters set forth in this Declaration.

1           3.       I make this Declaration in support of the concurrently filed Request for Entry of  
2 Order by Default. On March 13, 2024, on behalf of the Trustee, I filed his Motion to Approve  
3 Compromise of Controversy with Busey Bank (the "Motion") and the supporting Declaration of  
4 Kyle Everett. ECF 206, 206-1. Also, on March 13, 2024, on behalf of the Trustee, I filed the  
5 Notice and Opportunity for Hearing (the "Notice") relating to the Motion. ECF 207. I am  
6 informed and believe that the Notice was served on creditors in the Court's ECF service list on  
7 March 13, 2024, and on creditors listed on the Court's mailing matrix on March 14, 2024. ECF  
8 208.

9           4.       The Notice indicated that anyone wishing to object to the proposed stipulation  
10 was required to do so by filing and serving a written objection no later than 21 days from the  
11 date on which the Notice was served. The last day for filing and serving objections was April 4,  
12 2024. I received no objections, and none were filed in the bankruptcy case.

13           I declare under penalty of perjury that the above statements are true and that if called as  
14 a witness I could and would testify to their truthfulness. This declaration is executed on April  
15 5, 2024 in Contra Costa County, California.

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17                               /s/ Jennifer C. Hayes  
18                               Jennifer C. Hayes  
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